

# **EXHIBIT A**



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

October 11, 2021

**BY ELECTRONIC MAIL**

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**Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)***

Dear Counsel:

We write to notify you that the Government may seek to introduce certain evidence at trial. In particular, the Government may offer certain exhibits at trial that demonstrate that, in addition to the defendant's conduct with Jeffrey Epstein, the defendant took steps to please other influential men by providing them with access to women she selected for them. [REDACTED]

[REDACTED] We are producing these proposed exhibits today, marked with the following exhibit numbers: GX 401 through 404, GX 409 through 410, and GX 413.

In addition, please be advised that the Government may call [REDACTED] as a witness at trial. Today, we are producing Jencks Act materials relating to [REDACTED], who was employed by Jeffrey Epstein from [REDACTED]. The Government anticipates that [REDACTED] will testify about, among other things, certain documentary evidence relating to the charged crimes. The Government further anticipates that [REDACTED] will testify about her role in scheduling sexualized massages for Jeffrey Epstein with underage girls.

This evidence is admissible as direct evidence of the crimes charged and, in the alternative, pursuant to Rule 404(b) as proof of the defendant's intent, preparation, plan, knowledge, identity, and/or absence of mistake of accident with respect to the charges in the above-referenced case. Because this evidence is admissible as direct evidence, the Government is not planning to affirmatively move *in limine* to seek its admission.

Please note that this letter and the information contained herein is governed by the July 31, 2020 Protective Order in this case. **This letter is itself designated as “confidential” under the Protective Order.**

Very truly yours,

DAMIAN WILLIAMS  
United States Attorney

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